

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:

MMA LAW FIRM, PLLC,

Debtor.

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Case No. 24-31596
Chapter 11

CRISTÓBAL M. GALINDO, P.C. D/B/A
GALINDO LAW,

Plaintiff,

vs.

MMA LAW FIRM, PLLC,

Defendant.

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Adversary Proceeding No. 25-03310

UNOPPOSED MOTION OF CRISTÓBAL M. GALINDO, P.C.
D/B/A GALINDO LAW TO FILE MOTION FOR LEAVE TO FILE
A SUR-REPLY TO MMA LAW FIRM, PLLC'S REPLY TO THE
PLAINTIFF'S RESPONSE TO MMA LAW FIRM'S
MOTION FOR MOTION FOR SUMMARY
JUDGMENT AND THE SUPPLEMENT TO THE REPLY

(Relates to Docket Nos. 90 and 92)

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE EDUARDO V. RODRIGUEZ
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Cristóbal M. Galindo, P.C. d/b/a Galindo Law Firm (“**GLF**” or “**Galindo**”), by and through its undersigned counsel, hereby submits this Unopposed Motion for Leave to file a Sur-Reply to MMA Law Firm, PLLC’s Reply to the Plaintiff’s Response to MMA Law Firm’s Motion for Motion for Summary Judgment and the Supplement to the Reply [Docket Nos. 90 and 92], and would respectfully show as follows:

I. RELIEF REQUESTED

1. GLF seeks entry of an order, substantially in the form attached hereto (the “**Order**”), authorizing GLF to file a Sur-Reply (the “**Sur-Reply**”) to MMA Law Firm’s Reply to the Plaintiff’s Response to MMA Law Firm’s Motion for Summary Judgment and the Supplement to the Reply (collectively, the “**Combined Reply**”) [Docket Nos. 90 and 92], filed by the Debtor MMA Law Firm, PLLC (“**Debtor**,” “**MMA**,” or “**Defendant**”).

II. JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. 3.

3. The bases for the relief requested herein are Sections 105(a) of Title 11 of the United States Code.

III. BASIS FOR RELIEF

4. Section 105(a) of the Bankruptcy Code codifies the inherent equitable powers of the bankruptcy court and empowers the bankruptcy court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.”

5. On June 16, 2025, MMA filed the Defendant’s Motion for Summary Judgment (the “**MSJ**”) [Docket No. 74].

6. On July 7, 2025, GLF filed the Response to the MSJ (the “**Response**”) [Docket No. 86].

7. On July 9, 2025, MMA filed the Reply to the Response (the “**Reply**”) [Docket No. 90].

8. On July 10, 2025, MMA filed the Supplement to the Reply to the Response [Docket No. 92] (and with the Reply, the “**Combined Reply**”). The Combined Reply is 36-1/2 pages, excluding the signature line and certificate of conference, and brings up issues and arguments that are not included the MSJ or Response.

9. On July 11, 2025, this Court entered an Order Granting MMA’s Combined Reply to be filed of record [Docket No. 96].

10. GLF seeks leave to file a Sur-Reply to the Combined Reply.

11. MMA’s counsel does not oppose a Motion for Leave to file a Sur-Reply. However, MMA did not respond to a requested date by which to file the Sur-Reply.

12. No hearing has been scheduled on the MSJ.

13. GLF seeks leave to file the Sur-Reply through and including Friday, July 18, 2025.

IV. PRAYER

WHEREFORE, GLF requests this Court enter an Order allowing GLF to file a Sur-Reply to the Combined Reply by the deadline of through and including Friday, July 18, 2025, and granting such other relief as the Court deems just and proper.

Dated: July 14, 2025

Respectfully submitted,

RUTH A. VAN METER, P.C.

By: /s/ Ruth Van Meter
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- AND -

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**COUNSEL FOR Cristóbal M. GALINDO, P.C.
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CERTIFICATE OF CONFERENCE

Pursuant to the Local Rules, GLF reached out to MMA regarding filing a Motion for Leave to file a Sur-Reply. MMA does not oppose a Motion for Leave to file a Sur-Reply; however, MMA did not respond relating to a deadline by which to file the Sur-Reply.

Ruth Van Meter
Ruth Van Meter

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 14, 2025, a true and correct copy of this Motion was filed with the Court and served via the Court's CM/ECF system upon all parties registered to receive such electronic service in this bankruptcy case, including the U.S. Trustee and the following parties.

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Ruth Van Meter

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